

POMERANTZ LLP  
Jennifer Pafiti (SBN 282790)  
1100 Glendon Avenue, 15th Floor  
Los Angeles, California 90024  
Telephone: (310) 405-7190  
Facsimile: (212) 661-8665  
jpafiti@pomlaw.com

*Counsel for Stanislav Voronov*

*[Additional Counsel on Signature Page]*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

DONALD RAMSEY, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

COINBASE GLOBAL, INC., BRIAN  
ARMSTRONG, ALESIA J. HAAS,  
JENNIFER N. JONES, SUROJIT  
CHATTERJEE, PAUL GREWAL,  
MARC L. ANDREESSEN, FREDERICK  
ERNEST EHRSAM III, KATHRYN  
HAUN, KELLY KRAMER, GOKUL  
RAJARAM, FRED WILSON, AH  
CAPITAL MANAGEMENT LLC,  
PARADIGM FUND LP, RIBBIT  
MANAGEMENT COMPANY, LLC,  
TIGER GLOBAL MANAGEMENT,  
LLC, UNION SQUARE VENTURES,  
LLC, and VISERION INVESTMENT  
PTE LTD.

Defendants.

Case No.: 3:21-cv-05634-VC

NOTICE OF NON-OPPOSITION TO  
COMPETING MOTIONS FOR  
CONSOLIDATION, APPOINTMENT AS  
LEAD PLAINTIFF, AND APPROVAL OF  
LEAD COUNSEL

CLASS ACTION

Date: October 28, 2021

Time: 2:00 p.m.

Judge: Hon. Vince Chhabria

Courtroom: 4 – 17th Floor

<p>GABBY KLEIN, Individually and on Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>COINBASE GLOBAL, INC., BRIAN ARMSTRONG, ALESIA J. HAAS, JENNIFER N. JONES, SUROJIT CHATTERJEE, PAUL GREWAL, MARC L. ANDREESSEN, FREDERICK ERNEST EHRSAM III, KATHRYN HAUN, KELLY KRAMER, GOKUL RAJARAM, and FRED WILSON,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No.: 4:21-cv-06049-YGR</p> <p><u>CLASS ACTION</u></p>
<p>MATTHEW CATTERLIN, Individually and on Behalf of All Others Similarly Situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>COINBASE GLOBAL, INC., BRIAN ARMSTRONG, SUROJIT CHATTERJEE, PAUL GREWAL, ALESIA HAAS, MARC ANDREESSEN, FREDERICK ERNEST EHRSAM III, KATHRYN HAUN, KELLY KRAMER, GOKUL RAJARAM, FRED WILSON, AH CAPITAL, LLC, PARADIGM FUND LP, RIBBIT MANAGEMENT COMPANY, LLC, TIGER GLOBAL MANAGEMENT, LLC, UNION SQUARE VENTURES, LLC, and VISERION INVESTMENT PTE LTD,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No.: 4:21-cv-06149-YGR</p> <p><u>CLASS ACTION</u></p>

1 TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

2 On September 20, 2021, Stanislav Voronov (“Voronov”) filed a motion, pursuant to  
 3 Section 27(a)(3) of the Securities Act of 1933, 15 U.S.C. § 77z-1(a)(3), as amended by the Private  
 4 Securities Litigation Reform Act of 1995 (the “PSLRA”), and Federal Rule of Civil Procedure  
 5 42, for the entry of an Order: (1) consolidating the above-captioned related actions (the “Related  
 6 Actions”); (2) appointing Voronov as Lead Plaintiff in the Related Actions on behalf of a class  
 7 (the “Class”) consisting of all persons and entities that purchased or otherwise acquired Coinbase  
 8 Global, Inc. stock pursuant or traceable to the Registration Statement and Prospectus issued in  
 9 connection with Coinbase’s April 14, 2021 initial public stock offering; and (3) approving  
 10 Voronov’s selection of Pomerantz LLP as Lead Counsel for the Class. Dkt. No. 45.

11 Having reviewed the competing motions before the Court, Voronov does not appear to  
 12 have the largest financial interest in this litigation within the meaning of the PSLRA. This notice  
 13 of non-opposition shall have no impact on Voronov’s membership in the proposed Class or his  
 14 right to share in any recovery secured on behalf of the Class.

15 Dated: September 28, 2021 Respectfully submitted,

16 POMERANTZ LLP

17 /s/ Jennifer Pafiti

18 Jennifer Pafiti (SBN 282790)  
 19 1100 Glendon Avenue, 15th Floor  
 20 Los Angeles, California 90024  
 21 Telephone: (310) 405-7190  
 22 Facsimile: (212) 661-8665  
 23 jpafiti@pomlaw.com

24 POMERANTZ LLP

25 Jeremy A. Lieberman (*pro hac vice*)  
 26 J. Alexander Hood II (*pro hac vice*)  
 27 600 Third Avenue, 20th Floor  
 28 New York, New York 10016  
 Telephone: (212) 661-1100  
 Facsimile: (917) 463-1044  
 jalieberman@pomlaw.com  
 ahood@pomlaw.com

*Counsel for Stanislav Voronov*

POLLOCK COHEN LLP  
Adam Pollock  
Raphael Janove  
60 Broad Street, 24th Fl.  
New York, NY 10004  
Telephone: (212) 337-5361  
adam@pollockcohen.com  
rafi@pollockcohen.com

DILENDORF LAW FIRM PLLC  
Max Dilendorf  
4 World Trade Center, Suite 2979  
New York, NY 10006  
Telephone: (212) 457-9797  
md@dilendorf.com

*Additional Counsel for Stanislav Voronov*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**

I hereby certify that on September 28, 2021, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Jennifer Pafiti

Jennifer Pafiti